

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

BEHAVIORAL HEALTH INDUSTRY
NEWS, INC. D/B/A OPEN MINDS,

Plaintiff,

v.

MENTAL HEALTH SYSTEMS, INC.,

Defendant.

Civil Action

No.: 1:16-cv-01874-CCC

**DEFENDANT'S MOTION TO DISMISS FOR LACK OF PERSONAL
JURISDICTION OR, IN THE ALTERNATIVE, TO TRANSFER THIS
CASE TO THE SOUTHERN DISTRICT OF CALIFORNIA**

Pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure, Defendant Mental Health Systems, Inc., by and through its attorneys, DLA Piper LLP (US), hereby moves this Court to dismiss Plaintiff's Complaint for lack of personal jurisdiction or, in the alternative, to transfer this case to the United States District Court for the Southern District of California pursuant to 28 U.S.C. § 1404(a). The reasons in support of this Motion are set forth more fully in the accompanying Brief in Support.

Respectfully submitted,

/s/ Lauren M. Wilchek

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Pro hac vice applications anticipated

Attorneys for Defendant Mental Health
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CERTIFICATE OF SERVICE

I hereby certifies that a copy of the foregoing Defendant's Motion to Dismiss for Lack of Personal Jurisdiction or, in the Alternative, to Transfer this Case to the Southern District of California was served by first-class mail, postage prepaid, on September 19, 2016, upon counsel of record:

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